

Robert J. Tolchin

From: Hill, Brian <BHill@milchev.com>
Sent: Monday, June 11, 2012 12:48 PM
To: Robert Tolchin; Rochon, Mark; Hibey, Richard
Cc: M Haller
Subject: RE: Sokolow

Bob,

I write in response to your email below:

1. We see no basis for a deposition of the Prime Minister based on your emails or the link you provided. Therefore we are proposing no date for a deposition of the Prime Minister.
2. I expect to receive a better copy of the material you request in paragraph 2 below this week.
3. We are working on this issue. I hope to have it resolved later this week.
4. This will confirm that, as I told Mr. Haller and Mr. Solomon last week, we are still making additional inquiries for documents which may be responsive to requests 1-4 of the Sokolow Plaintiffs First Request to Produce Documents and Things and requests 13-16, 19 and 21 of Plaintiff's Fifth Request to Produce Documents and Things.
5. This will also confirm that, as Mr. Haller told me last week, you will be shortly making additional productions of materials which were previously produced by your clients in the Arab Bank case and that you will prioritize those documents which pertain to those of your clients whose depositions are coming up in the near future.
6. This will also confirm that, as Mr. Haller told me last week, you will be shortly sending us a DVD containing a copy of all the materials you have previously produced in this matter so we can verify that we have in fact received all of your prior productions in this matter.

Regards,

Brian A. Hill
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From: Robert Tolchin [<mailto:rjt.berkman@gmail.com>]
Sent: Friday, June 08, 2012 10:13 AM
To: Hill, Brian; Rochon, Mark; Hibey, Richard
Cc: M Haller
Subject: Sokolow

Brian -

1) I am still awaiting a response to my June 5 email regarding Fayyad's deposition. As per your request to Mordechai and Aaron during the last meet and confer, please be advised that Fayyad's and Abbas' participation in the official PA military funeral for the terrorist mass-murderer Ali Ja'ara was reported here: http://www.palwatch.org/main.aspx?fi=157&doc_id=6923 Please provide dates for the deposition.

2) During the meet and confer you told Mordechai and Aaron that you had located the martyr file/form for Sa'id Awada (who carried out the June 19, 2002, bombing which harmed the Mandelkorn plaintiffs) but that the copy is poor and you are attempting to get a better copy. Please advise when exactly you will produce this document.

3) During the meet and confer you also stated that you are encountering various delays in providing the supplemental response to interrogatory no. 6 of the Fourth Set of Interrogatories from all plaintiffs (regarding Muhammed Dahlan). Please advise when we can expect that supplemental response.

4) You also stated during the meet and confer that you would be sending a follow-up email confirming that you are continuing to seek information/documents in respect to certain of the discovery requests that were discussed during the conference, and plaintiffs' counsel stated that we would hold off on seeking any relief in respect to those discovery requests pending the receipt of that email; please advise when we will receive that email.

Thanks,

- Bob Tolchin